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25 Attorneys for Defendant  
26 CALIX, INC.

27 UNITED STATES DISTRICT COURT  
28 NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

19 TRACY HANKINS,

20 Plaintiff,

21 vs.

22 CALIX INC. and DOES 1-25,

23 Defendants,

Case No. 5:19-cv-07547-SVK

**STIPULATION AND ~~PROPOSED~~  
ORDER RE: FEDERAL RULE OF  
EVIDENCE 502(d)**

Complaint Filed: 11/15/2019  
Trial Date: 5/3/2021

26 ///

27 ///

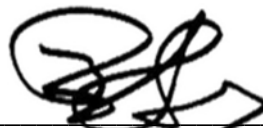
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1 Plaintiff Tracy Hankins ("Plaintiff") and Defendant Calix, Inc. ("Defendant"), by and  
2 through their respective counsel of record, stipulate as follows in order to facilitate the exchange  
3 of information and documents, which may be subject to confidentiality limitations on disclosure  
4 due to federal laws, state laws, and privacy rights, as follows:

5 1. The production of privileged or work-product protected documents, electronically  
6 stored information ("ESI") or information, whether inadvertent or otherwise, is not a waiver of the  
7 privilege or protection from discovery in this case or in any other federal or state proceeding. This  
8 Order shall be interpreted to provide the maximum protection allowed by California law and  
9 federal law, including Federal Rule of Evidence 502(d).

10 2. Nothing contained herein is intended to or shall serve to limit a party's right to  
11 conduct a review of documents, ESI or information (including metadata) for relevance,  
12 responsiveness and/or segregation of privileged and/or protected information before production.  
13 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

14  
15 DATED: March 4, 2020

  
\_\_\_\_\_  
Attorneys for Plaintiff Tracy Hankins

16  
17 DATED: March 6, 2020

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/s/ Amy P. Frenzen  
Attorneys for Defendant Calix, Inc.

18  
19 **~~[PROPOSED]~~ ORDER**

20 GOOD CAUSE APPEARING, the Stipulated 502(d) Protective Order is hereby approved  
21 and adopted. IT IS SO ORDERED.

22  
23 DATED: March 9, 2020

  
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United States Magistrate Judge Susan Van Keulen